

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



August 23, 2007

Mr. Denis Blais
TRC
400 Southborough Drive
South Portland, ME 04106

Re: Waterbury Generation, LLC.
Waterbury

Dear Mr. Blais:

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided for the proposed construction of a turbine and electrical work at Waterbury Generation in Waterbury, Connecticut. According to our information there are no known extant populations of Federal or State Endangered, Threatened or Special Concern Species that occur at the site in question.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Natural Resources Center's Geological and Natural History Survey and cooperating units of DEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available.

Please contact me if you have further questions at 424-3592. Thank you for consulting the Natural Diversity Data Base. Also be advised that this is a preliminary review and not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEP for the proposed site.

Sincerely,

Dawn M. McKay
Biologist/Environmental Analyst

DMM/blm



400 Southborough Drive
South Portland, ME 04106

207.879.1930 PHONE
207.879.9293 FAX

www.TRCsolutions.com

August 20, 2007

Connecticut Department of Environmental Protection
Wildlife Division
Bureau of Natural Resources
79 Elm Street, 6th Floor
Hartford, Connecticut 06106-5127

**RE: Waterbury Generation, LLC
Waterbury, Connecticut**

Dear Environmental Reviewer:

On behalf of Waterbury Generation, LLC, TRC is requesting information from the Connecticut Department of Environmental Protection Wildlife Division on the presence of any state-listed threatened or endangered species in the vicinity of the proposed project area. The project will involve the construction of a new nominal 100 megawatt simple-cycle peaking power plant in Waterbury, Connecticut. The new plant would also require a 210 foot high emission stack. The project site is located in an industrial area and the new facility will primarily occupy the existing paved (vacant) parking lot that will be leased from Ansonia Copper & Brass, Inc (ACB Facility). Some of the project components will be constructed within a portion of the southern end of the existing ACB Facility (see enclosed site photograph).

In addition to the new power plant, approximately 1.5 miles of new 115 kilovolt overhead transmission line will be constructed from the existing Baldwin Substation located south of the project site. The new transmission line would follow along the east side of the existing Metro North Railroad tracks to the new power plant location. Poles would have a maximum height of 85 to 115 feet.

Included with this letter are a U.S.G.S. locus map, aerial photographs showing the project location, and a completed Connecticut Natural Diversity Data Base (CT NDDDB) Review Request Form. In addition, a copy of the CT NDDDB map for the project site in Waterbury is also included. According to the CT NDDDB map, there are no protected species or significant natural communities located at or in the vicinity of the project area.

If you have any questions regarding the proposed project, please do not hesitate to call me at 207 879-1930.

Regards,
TRC

Denis Blais

cc: Mike Anderson, TRC
File





Connecticut Natural Diversity Data Base Review Request Form

Please complete this form *only* if you have conducted a review which determined that your activity is located in an area of concern.

Name: **Denis Blais**

Affiliation: **TRC**

Mailing Address: **400 Southborough Drive**

City/Town: **South Portland**

State: **ME**

Zip Code: **04106**

Business Phone: **207-879-1930**

ext. **23**

Fax: **207-879-9293**

Contact Person: **Denis Blais**

Title: **Senior Biologist**

Project or Site Name: **Waterbury Generation, LLC**

Project Location

Town: **Waterbury**

USGS Quad: **Waterbury**

Brief Description of Proposed Activities:

Construction of a new 100 megawatt simple-cycle peaking turbine within an existing industrial area and 1.5 miles of new 115 kilovolt overhead electric transmission.

Have you conducted a "State and Federal Listed Species and Natural Communities Map" review?

☒ Yes ☐ No Date of Map: **June 2007**

Has a field survey been previously conducted to determine the presence of any endangered, threatened or special concern species? ☐ Yes ☒ No

If yes, provide the following information and submit a copy of the field survey with this form.

Biologists Name:

Address:

If the project will require a permit, list type of permit, agency and date or proposed date of application:

CT Siting Council; CTDEP Stormwater Permit; CTDEP Wastewater Discharge Permit.

(See reverse side - you must sign the certification on the reverse side of this form)

The Connecticut Natural Diversity Data Base (CT NDDB) information will be used for:

- ☒ permit application
- ☐ environmental assessment (give reasons for assessment):
- ☐ other (specify):

"I certify that the information supplied on this form is complete and accurate, and that any material supplied by the CT NDDB will not be published without prior permission."

Dani Blais

Signature

August 17, 2007

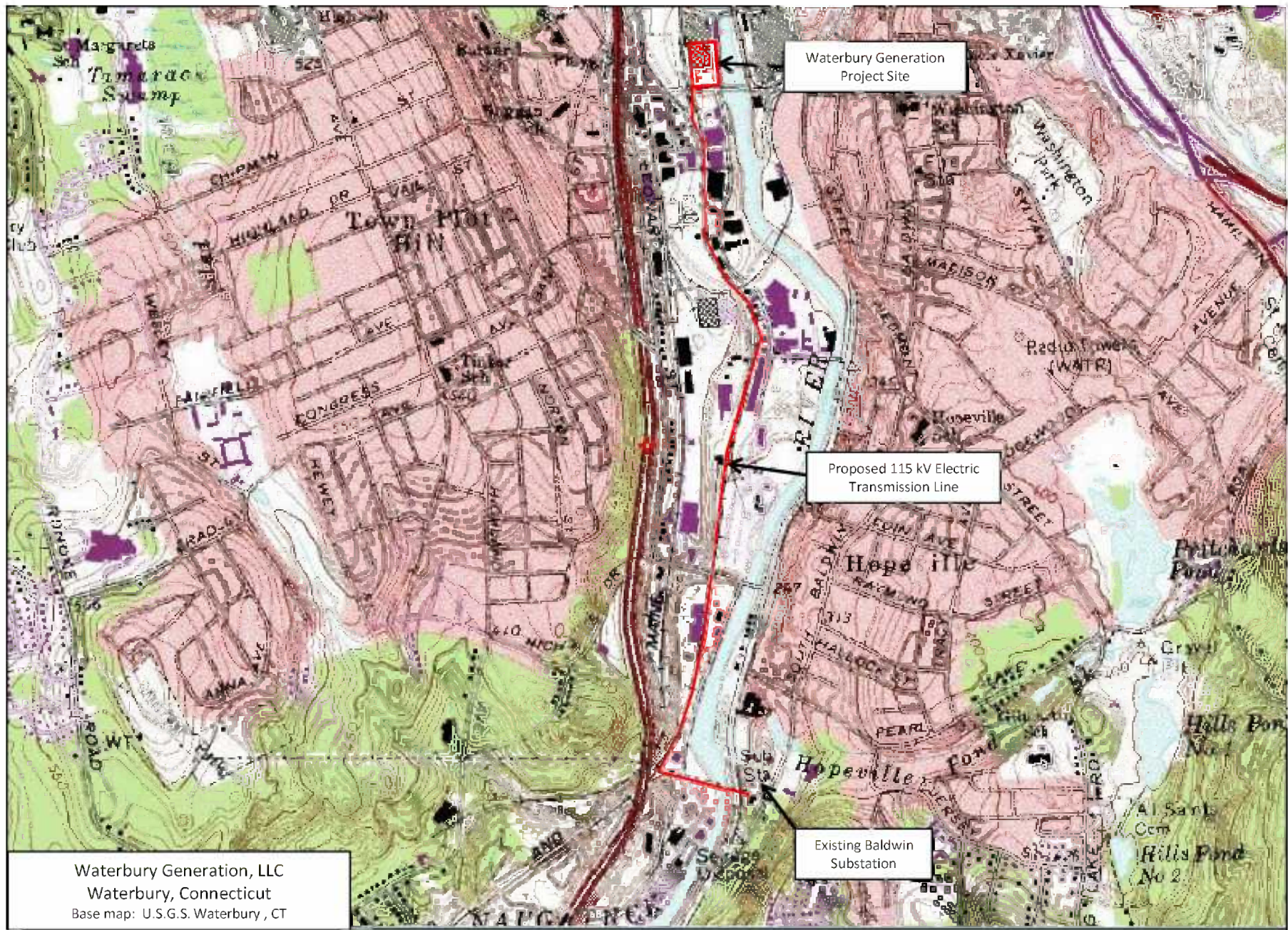
Date

All requests must include a USGS topographic map with the project boundary clearly delineated.

Return completed form to:

WILDLIFE DIVISION
BUREAU OF NATURAL RESOURCES
DEPARTMENT OF ENVIRONMENTAL PROTECTION
79 ELM ST, 6TH FLOOR
HARTFORD, CT 06106-5127

* You must submit a copy of this completed form with your registration or permit application.



Waterbury Generation
Project Site

Proposed 115 kV Electric
Transmission Line

Existing Baldwin
Substation

Waterbury Generation, LLC
Waterbury, Connecticut
Base map: U.S.G.S. Waterbury, CT



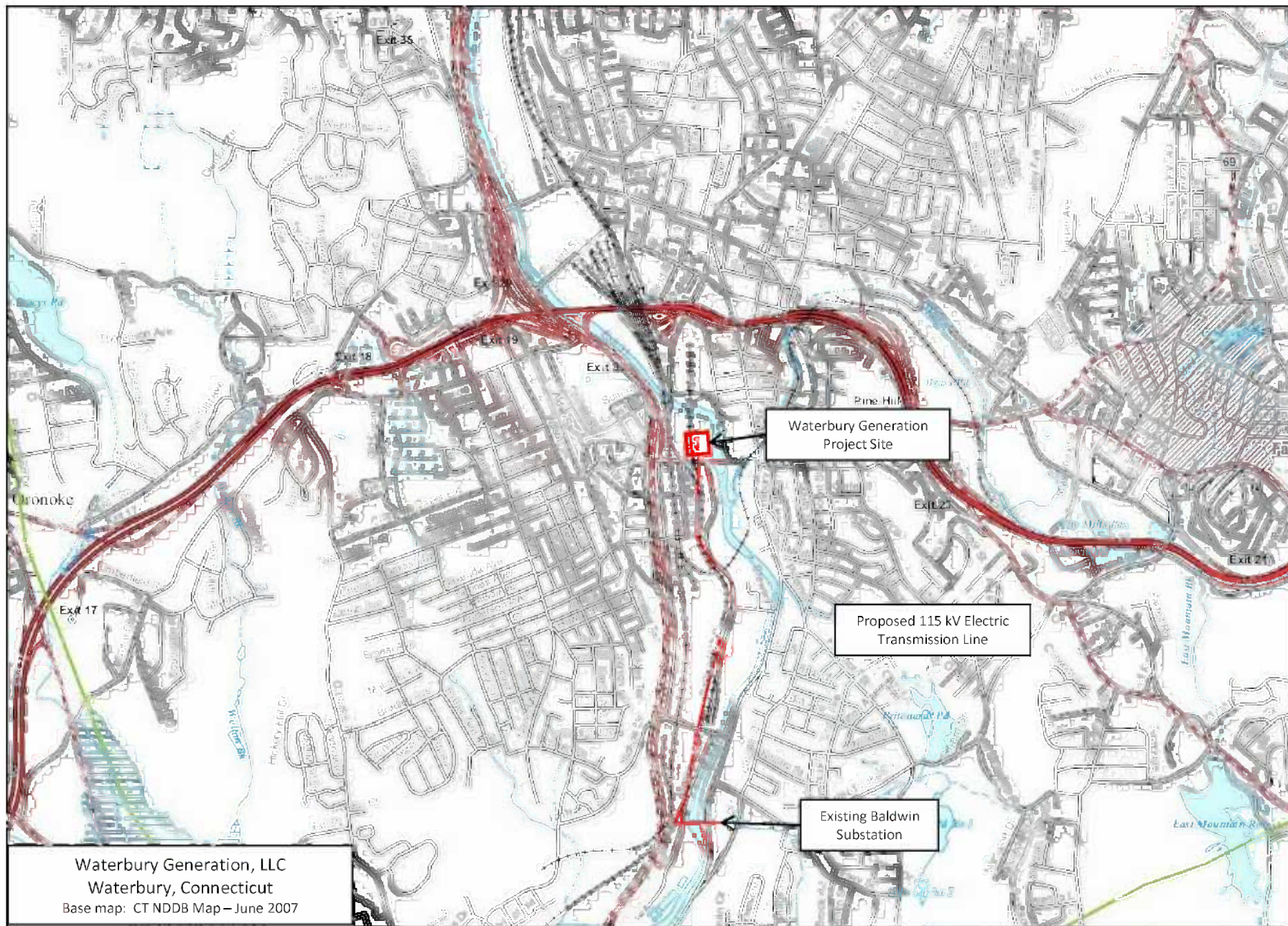
Project Area

Proposed 115 kV Electric
Transmission Line

Waterbury Generation, LLC
Waterbury, Connecticut

Base map: Google Earth 2007 – Waterbury, CT
Sheet 1 of 2









United States Department of the Interior

FISH AND WILDLIFE SERVICE

New England Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5087



September 21, 2007

Reference:	<u>Project</u>	<u>Location</u>
	Power plant, transmission line	Waterbury, CT

Denis Blais
TRC Environmental Corporation
400 Southborough Drive
South Portland, ME 04106

Dear Mr. Blais:

This responds to your recent correspondence requesting information on the presence of federally-listed and/or proposed endangered or threatened species in relation to the proposed activity(ies) referenced above.

Based on information currently available to us, no federally-listed or proposed, threatened or endangered species or critical habitat under the jurisdiction of the U.S. Fish and Wildlife Service are known to occur in the project area(s). Preparation of a Biological Assessment or further consultation with us under Section 7 of the Endangered Species Act is not required.

This concludes our review of listed species and critical habitat in the project location(s) and environs referenced above. No further Endangered Species Act coordination of this type is necessary for a period of one year from the date of this letter, unless additional information on listed or proposed species becomes available.

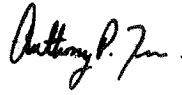
In order to curtail the need to contact this office in the future for updated lists of federally-listed or proposed threatened or endangered species and critical habitats, please visit the Endangered Species Consultation page on the New England Field Office's website:

www.fws.gov/northeast/newenglandfieldoffice/EndangeredSpec-Consultation.htm

In addition, there is a link to procedures that may allow you to conclude if habitat for a listed species is present in the project area. If no habitat exists, then no federally-listed species are present in the project area and there is no need to contact us for further consultation. If the above conclusion cannot be reached, further consultation with this office is advised. Information describing the nature and location of the proposed activity that should be provided to us for further informal consultation can be found at the above-referenced site.

Thank you for your coordination. Please contact us at 603-223-2541 if we can be of further assistance.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Anthony P. Tur". The signature is fluid and cursive, with a prominent initial "A" and a trailing flourish.

Anthony P. Tur
Endangered Species Specialist
New England Field Office



400 Southborough Drive
South Portland, ME 04106

207.879.1930 PHONE
207.879.9293 FAX

www.TRCSolutions.com

August 20, 2007

Mr. Michael Amaral, Wildlife Biologist
U.S. Fish & Wildlife Service
Ecological Services
70 Commercial Street, Suite 300
Concord, NH 03301-5087

**RE: Waterbury Generation, LLC
Waterbury, Connecticut**

Dear Mr. Amaral:

On behalf of Waterbury Generation, LLC, TRC is requesting information from the U.S. Fish & Wildlife Service on the presence of any federally-listed threatened or endangered species in the vicinity of the proposed project area. The project will involve the construction of a new nominal 100 megawatt simple-cycle peaking power plant in Waterbury, Connecticut. The new plant would also require a 210 foot high emission stack. The project site is located in an industrial area and the new facility will primarily occupy the existing paved (vacant) parking lot that will be leased from Ansonia Copper & Brass, Inc (ACB Facility). In addition, some of the project components will be constructed within a portion of the southern end of the existing ACB Facility (see enclosed site photograph).

In addition to the new power plant, approximately 1.5 miles of new 115 kilovolt overhead transmission line will be constructed from the existing Baldwin Substation located south of the project site. The new transmission line would follow along the east side of the existing Metro North Railroad tracks to the new power plant location. Poles would have a maximum height of 85 to 115 feet.

Included with this letter are a U.S.G.S. locus map and aerial photographs showing the project location. In addition, a GIS based map obtained from the Connecticut Department of Environmental Protection Natural Diversity Data Base (CT NDDB) is also included. The CT NDDB depicts the locations of known state and federal listed species and significant natural communities relative to the project area. According to the CT NDDB, there are no protected species or significant natural communities located at or in the vicinity of the project area.

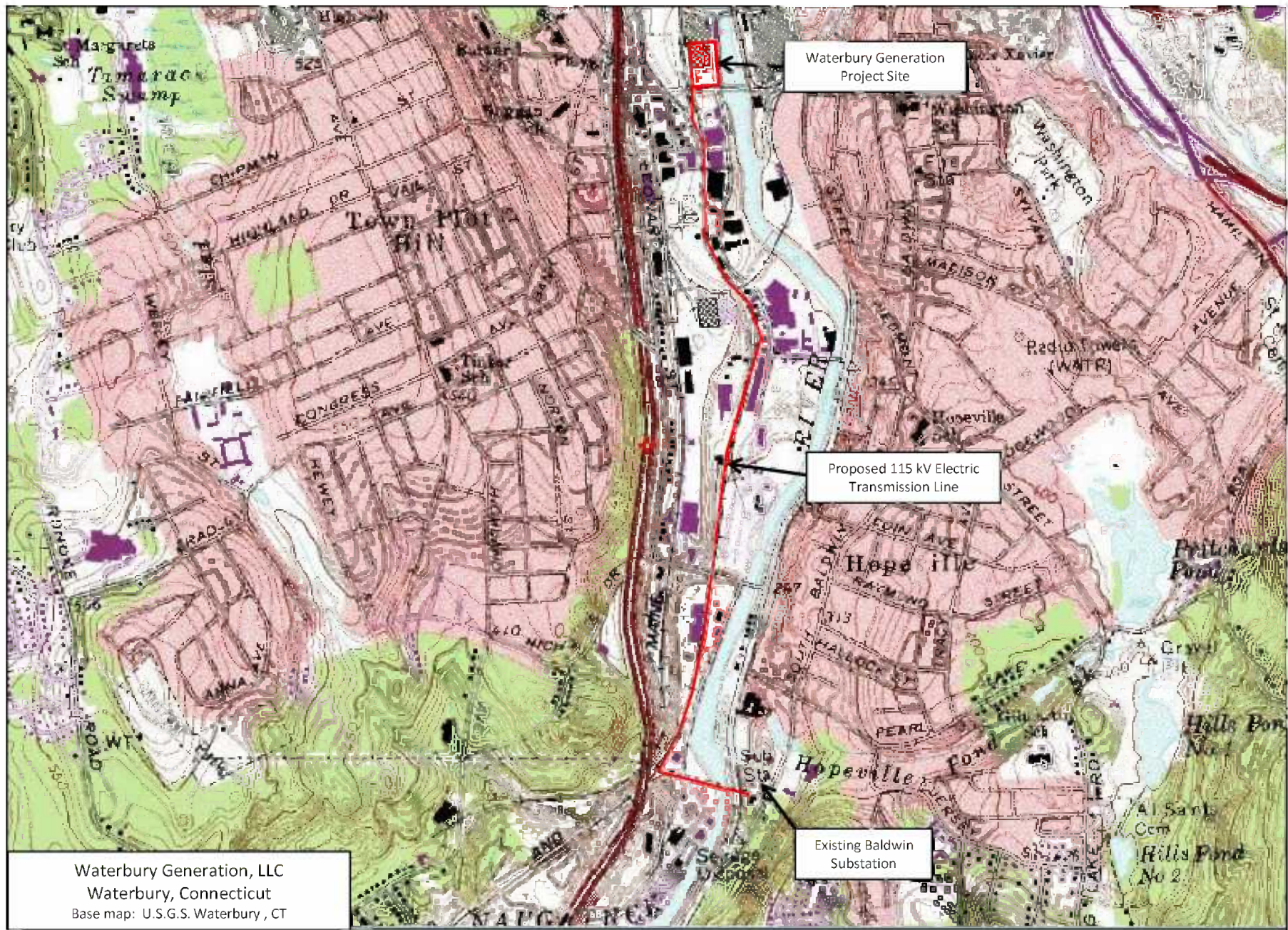
If you have any questions regarding the proposed project, please do not hesitate to call me at 207 879-1930.

Regards,
TRC

Denis Blais

cc: Mike Anderson, TRC
File



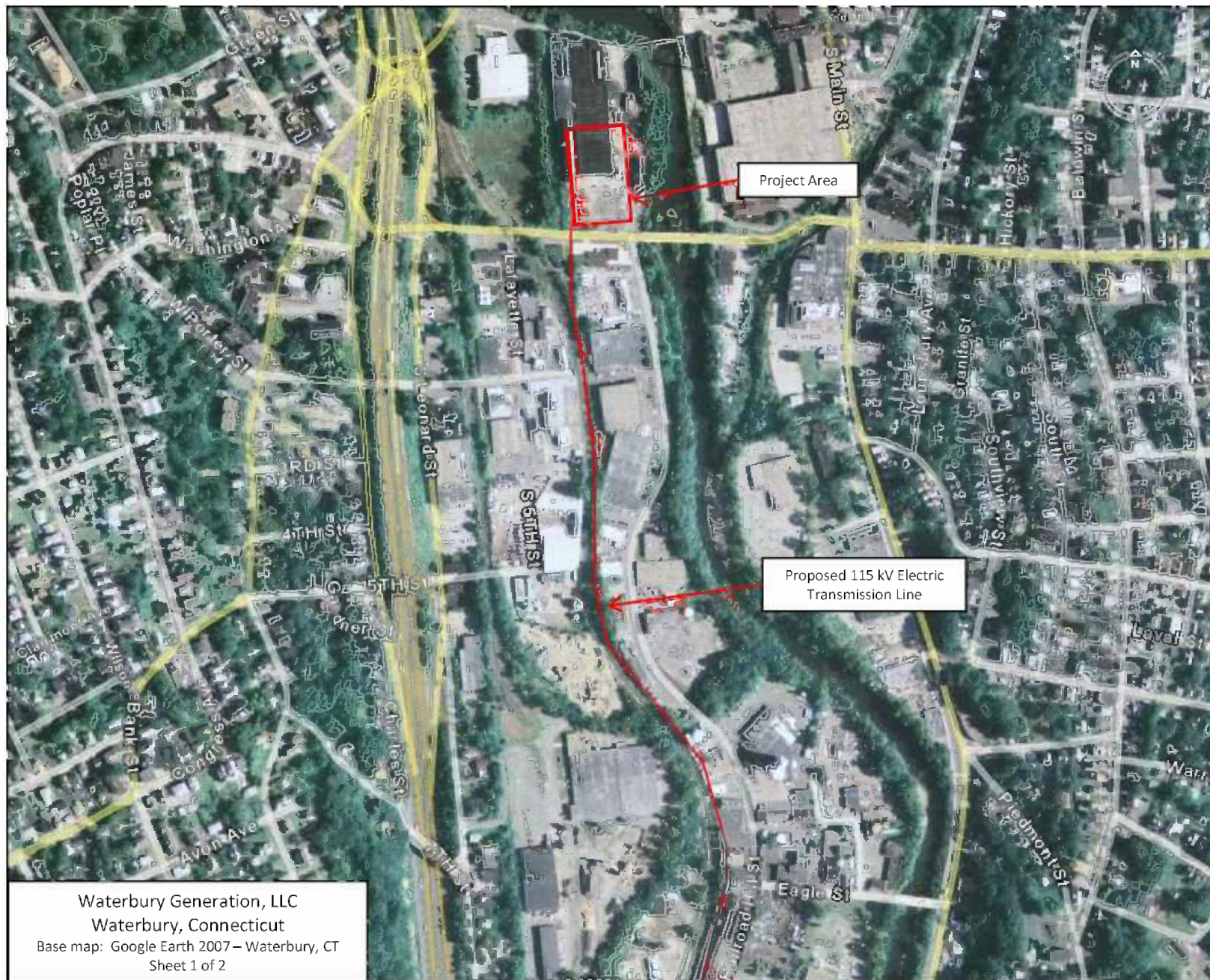


Waterbury Generation
Project Site

Proposed 115 kV Electric
Transmission Line

Existing Baldwin
Substation

Waterbury Generation, LLC
Waterbury, Connecticut
Base map: U.S.G.S. Waterbury, CT

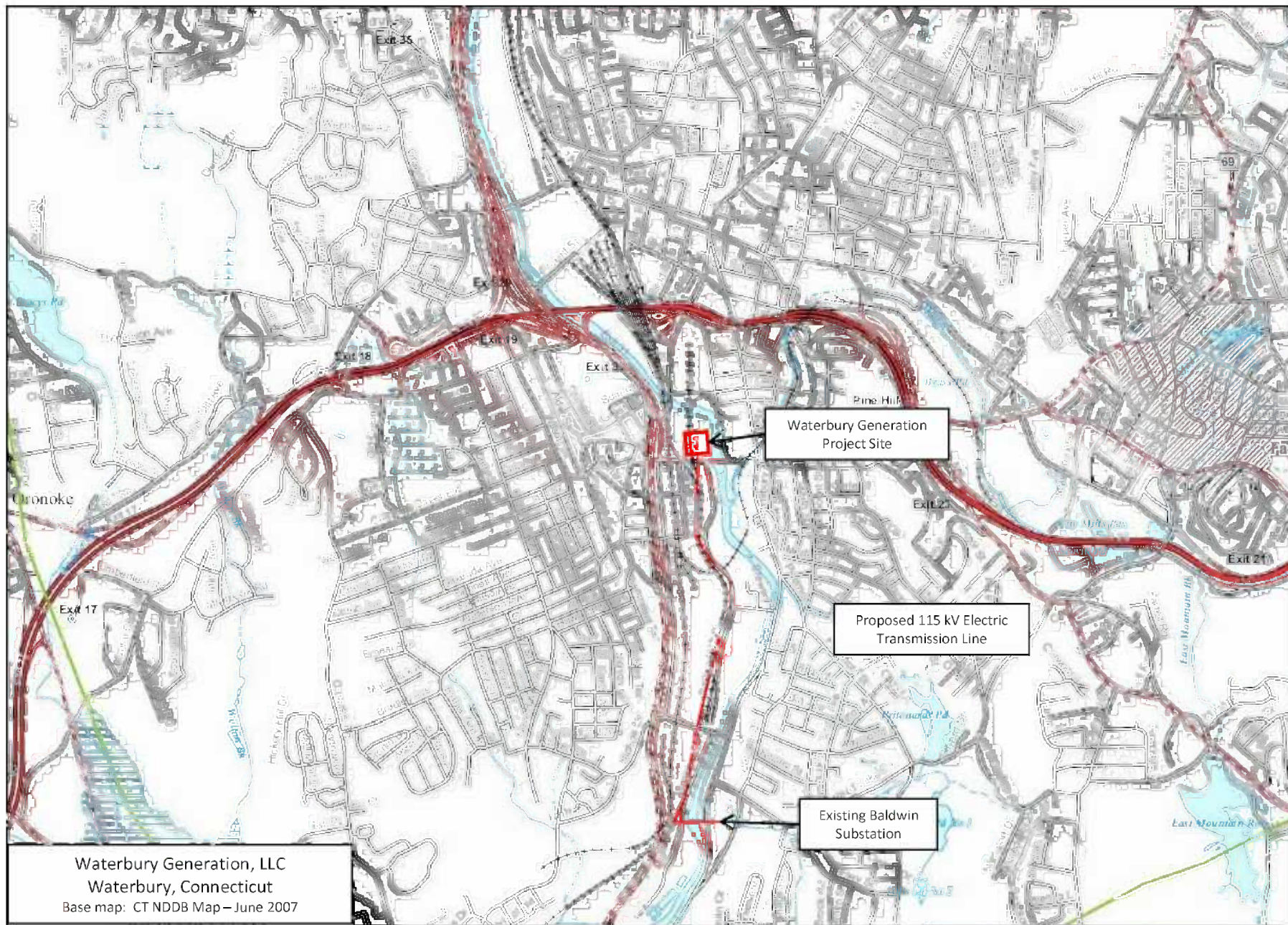


Project Area

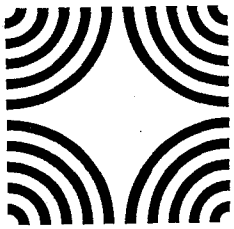
Proposed 115 kV Electric
Transmission Line

Waterbury Generation, LLC
Waterbury, Connecticut
Base map: Google Earth 2007 – Waterbury, CT
Sheet 1 of 2









Connecticut Commission on Culture & Tourism

September 18, 2007

Historic Preservation
& Museum Division

Mr. John P. Campbell
FirstLight Power Resources
One Corporate Center
20 Church Street, 16th Floor
Hartford, CT 06103

Subject: Waterbury Generation LLC
725 Bank Street
Waterbury, CT

59 South Prospect Street
Hartford, Connecticut
06106

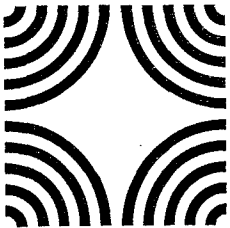
(V) 860-566-3005
(F) 860-566-5078

Dear Mr. Campbell:

The State Historic Preservation Office has reviewed the above-named project. This office notes that Ansonia Copper and Brass (Holmes, Booth and Haydens Brass Works) possesses historic and industrial importance and has been inventoried as part of Connecticut's Historic American Engineering Record. We believe that the Ansonia Copper and Brass (Holmes, Booth and Haydens Brass Works) is eligible for the National Register of Historic Places.

In the opinion of the State Historic Preservation Office, the proposed 96 megawatt simple cycle power plant will effect the historic integrity of the Ansonia Copper and Brass (Holmes, Booth and Haydens Brass Works). However, this office believes that the proposed actions will constitute no adverse effect upon this important industrial resource. This comment is conditional upon the professional implementation of the following mitigative measures:

- Prior to construction-related activities, FirstLight Power Resources and/or Waterbury Generation LLC shall document the Ansonia Copper and Brass (Holmes, Booth and Haydens Brass Works) to the professional standards of the State Historic Preservation Office. Documentation shall consist of narrative text, photographs and/or high-quality digital images (exterior and interior perspectives and pertinent details), an index of photographs, and a photographic site plan. Final documentation shall be provided to the State Historic Preservation Office for permanent archiving and public accessibility.
- FirstLight Power Resources and/or Waterbury Generation LLC shall prepare and submit a brief history and description of the Ansonia Copper and Brass (Holmes, Booth and Haydens Brass Works), including project-related information, photographs and maps, to the *Society for Industrial Archeology New England Chapters Newsletter*.



Waterbury Generation LLC
725 Bank Street
Waterbury, CT
Page 2

- FirstLight Power Resources and/or Waterbury Generation LLC shall retain an industrial archaeologist who meets National Park Service qualification standards to monitor and professionally document any industrial archaeological remains that may be exposed through project-related ground disturbance. FirstLight Power Resources and/or Waterbury Generation LLC shall consult with the Office of State Archaeology at the University of Connecticut (Storrs) regarding the curation of industrial artifacts that may be recovered through the archaeological monitoring.

The State Historic Preservation Office appreciates the opportunity to have reviewed and commented upon the proposed undertaking. This office supports and endorses the proposed new power facilities and adaptive use of this important industrial resource.

This office looks forward to further coordination with all interested parties regarding the expeditious furtherance of the proposed undertaking as well as the professional management of Connecticut's cultural heritage.

For further assistance please contact Dr. David A. Poirier, Staff Archaeologist.

Sincerely,

Karen Senich
Deputy State Historic Preservation Officer

cc: Dr. Nicholas Bellantoni/OSA

List of Consultants

Dr. Bruce Clouette
Archaeological & Historical Services
PO Box 543
Storrs, CT 06268
Phone: (860) 429-1723
Fax: (860) 429-1724

Ms. Cece Saunders
Historical Perspectives Inc.
P.O. Box 3037
Westport, CT 06880
Phone: (203) 226-7654
Fax: (203) 226-8376

Ms. Deborah C. Cox
PAL Inc.
210 Lonsdale Avenue
Pawtucket, RI 02860
Phone: (401) 728-8780
Fax: (401) 728-8784

Dr. Michael S. Raber
Raber Associates
81 Dayton Road
P.O. Box 46
South Glastonbury, CT 06073
Phone: (860) 633-9026
Fax: (860) 633-9026

Mr. Robert Stewart
Historical Technologies
1230 Copper Hill Road
West Suffield, CT 06093
Phone: (860) 668-2928
Fax: (860) 668-9988

Ms. Mary G. Harper
Public Archaeology Survey Team
P.O. Box 209
Storrs, CT 06268
Phone: 860-429-1723
Fax: 860-429-1724



One Corporate Center
20 Church Street, 16th Floor
Hartford, CT 06103
(860) 895-6900

September 12, 2007

Ms. Karen Senich
Deputy State Historic Preservation Officer
Connecticut Commission on Culture and Tourism
State Historic Preservation Office
59 South Prospect Street
Hartford, CT 06106

RE: Response to Request for Information, Waterbury Generation, LLC, Waterbury, Connecticut

Dear Ms. Senich,

FirstLight Power Resources Services, LLC as agent for Waterbury Generation, LLC is hereby responding to your request for further information to be provided so that comments can be provided vis-à-vis the National Historic Preservation Act. As TRC indicated in the August 20, 2007 submission to you, the project will involve the construction of a new approximately 96 megawatt simple cycle power plant to be located on a vacant parking lot located at the south end of the Ansonia Copper and Brass facility located at 725 Bank Street in Waterbury, Connecticut. The control room module and the power control module will be located within an existing portion of the building due to space limitations. The power plant will be constructed of modular components located in the vacant, paved area shown on the attached photographs. It should be noted that the current on-site structures will not be demolished or renovated during the construction process.

As requested, attached are digital photographs that have been taken of the current Ansonia Copper and Brass facility showing view of both the exterior and interior portions of the building. The corporate history, dates of construction and summary of the building were taken from various environmental site condition reports of the subject property and is summarized in the attachment. Also attached, please find a visual rendering of the power plant as it would be seen from the south, looking north onto the property as well as a general site layout plan. As noted previously, the new plant will require a 213 foot high emission stack to meet the Department of Environmental Protection's air quality regulations. The remainder of the plant elevation will be below that of existing on-site structures on the property.

Please call Cynthia Vodopivec at (860) 895-6961 with any questions.

Best Regards,

A handwritten signature in black ink that reads "John P. Campbell". The signature is written in a cursive, flowing style.

John P. Campbell
Waterbury Generation Project Manager

Attachments

SUMMARY OF SITE HISTORY

According to the City of Waterbury Assessor's Office, the Site is identifiable through Parcel ID Number 0368-0282-0003. The Site is listed as both a heavy manufacturing commercial property and a light industrial manufacturing commercial property; both of which are consistent with the current use of the Site and surrounding area. The Assessor's Commercial Property Record Card for the Site describes the Site as being improved with an approximately 35,000 square foot brick building constructed in 1870 and an approximately 111,000 square foot brick building constructed in 1900. The property card also indicates that the surrounding acreage was paved in approximately 1955.

The listing below summarizes review of Historical Sanborn Fire Maps for the site property for maps:

Map Year	Summary
1884	The Site appears occupied by the Holmes, Booth, & Hayden Wire and Brass Goods Manufacturing facility. The manufacturing facility consists of a main manufacturing plant complete with a rolling mill, stamping room, a muffle room, a foundry, a machine shop, a tube fitting room, and multiple storage and office areas. The Site spans both east and west of the railroad corridor with a side track located east of the main building. Multiple small storage sheds appear throughout the Site.
1890	The Site appears much as it did on the 1884 Sanborn map.
1895	The Site appears much as it did on the 1890 Sanborn map.
1901	The Site appears much as it did on the 1895 Sanborn map with some expansion of the main building to the east.
1922	The Site appears much as it did on the 1901 Sanborn map; however, the Site is now operated by the American Brass Company and the side track on the eastern side of the building is no longer depicted. A new side track is present on the western side of the railroad corridor.
1950	The main building (east of the railroad corridor) appears much as it did on the 1922 Sanborn map with many of the buildings located west of the railroad corridor no longer depicted. These demolished buildings included a tinning/annealing/rod mill, various storage buildings and a coal repository and approximately half of the office/wire storage building. Structures that remain on the western side of the rail corridor include the remaining portion of the office/wire storage building, the laboratory and two auto storage buildings.
1956	The Site appears much as it did on the 1950 Sanborn map with the laboratory and auto storage buildings no longer present.
1962	The Site appears much as it did on the 1956 Sanborn map with the exception of the transformation of the northwestern-most wire storage and office building into a bowling alley.
1968	The Site appears much as it did on the 1962 Sanborn map; however, the Site is now operated by the Anaconda - American Brass Company. Also, the wire storage/bowling building is no longer present and a car wash was built in the northwestern portion of the Site

SUMMARY OF SITE OWNERSHIP

According to information gathered from the above documentation the Site operated as a metal workings facility as early as the 1850s. At that time, the Site was owned and operated by Holmes, Booth, & Hayden Mfg. Wire and Brass Works. Between the early 1900s and the 1960s, the Site was owned and operated by American Brass Company. Anaconda American Brass Company owned and occupied the Site from the 1960s to approximately 1981. Between 1981 and 1985 the Site was owned and operated by Atlantic Richfield Co. From 1985 to 1986, the Site was owned by the Ansonia Copper and Brass, L.P. In 1986, Ansonia Copper and Brass, L.P. became Ansonia Copper and Brass, Inc., which has owned and operated the Site since 1986.



View of Ansonia Copper and Brass entrance from Bank Street.



View of northwest side of Ansonia Copper and Brass building.



View of west side of Ansonia Copper and Brass facility.



View of interior of building, looking to the south.



View of interior of warehouse looking southwest.



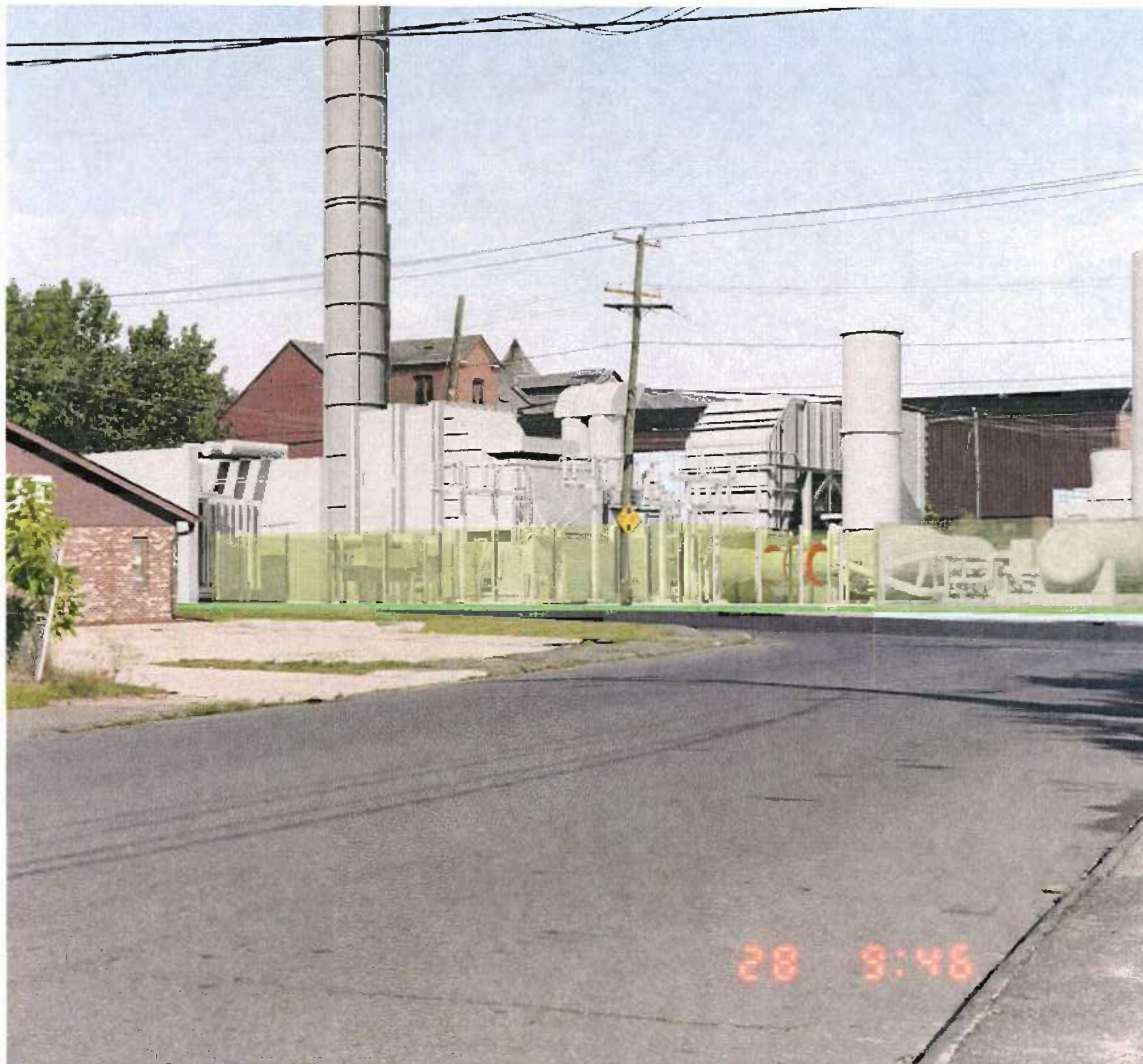
View of southern end of Ansonia Copper and Brass building where controls will be situated for Waterbury Generation.

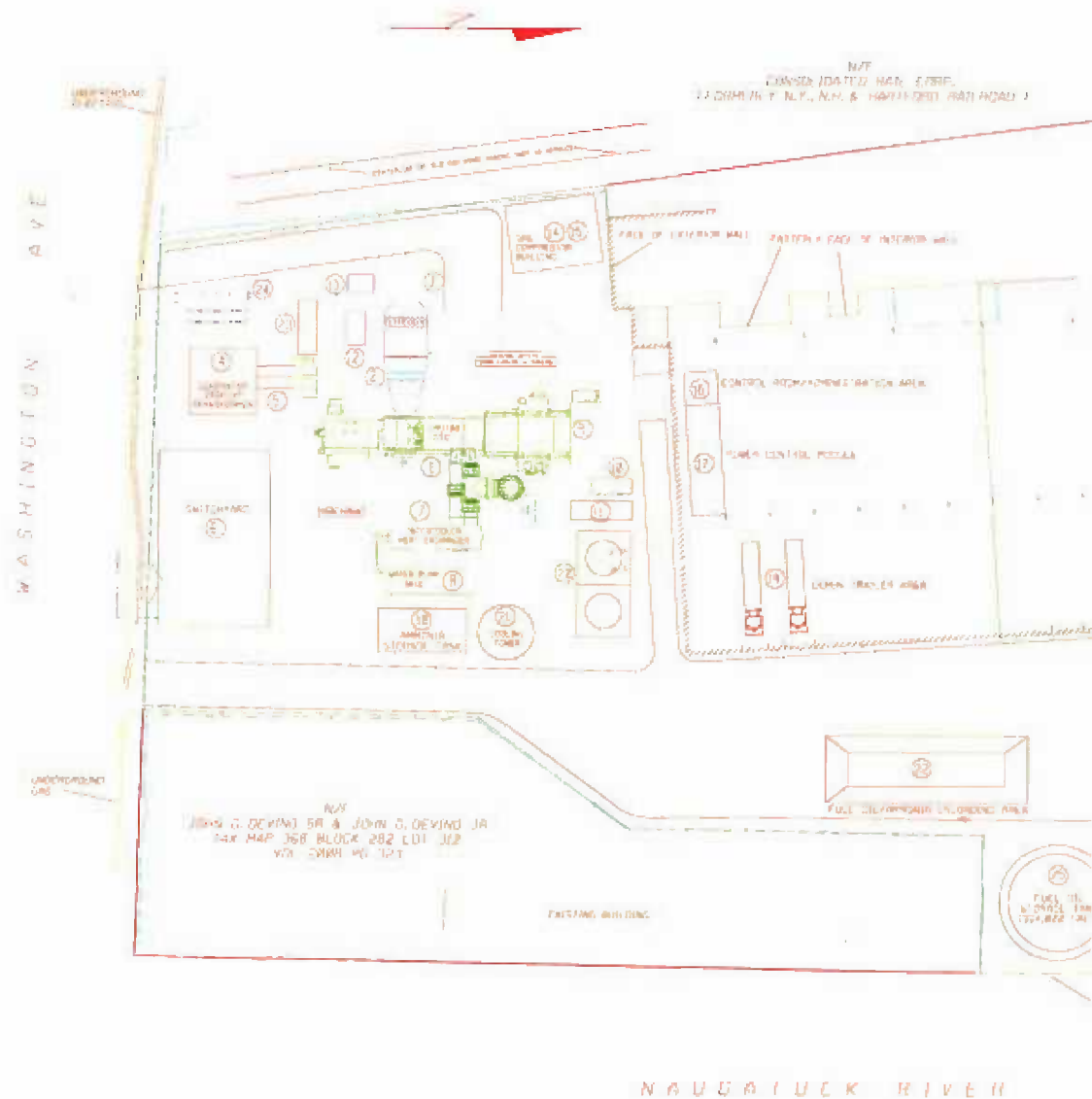


View of south side of Ansonia Copper and Brass facility, looking to the east.



View of southern portion of property, proposed location of Waterbury Generation project.







Connecticut Commission on Culture & Tourism

August 23, 2007

Historic Preservation
& Museum Division

Mr. Denis Blais
TRC
400 Southborough Drive
South Portland, ME 04106

Subject: Waterbury Generation LLC
Waterbury, CT

59 South Prospect Street
Hartford, Connecticut
06106

(v) 860.566.3005
(f) 860.566.5078

Dear Mr. Blais:

The State Historic Preservation Office has reviewed the above-named project. This office respectfully requests that the following information be provided for further review:

- Photographs and/or digital images (exterior and interior) of the existing Ansonia Copper & Brass Inc. facility.
- Corporate history, and date of construction, of the ACB Facility.
- Proposed elevation or visual rendering of the proposed new power plant and emission stack.

Upon submission of the requested material, the State Historic Preservation Office will provide substantive comments vis-a-vis the National Historic Preservation Act.

We look forward to working with all interested parties in the expeditious furtherance of the proposed project as well as in the professional management of Connecticut's cultural heritage.

For further information please contact Dr. David A. Poirier, Staff Archaeologist.

Sincerely,

Karen Senich
Deputy State Historic Preservation Officer



400 Southborough Drive
South Portland, ME 04106

207.879.1930 PHONE
207.879.9293 FAX

www.TRCsolutions.com

August 20, 2007

Karen Senich, Deputy State Historic Preservation Officer
Connecticut Commission on Culture and Tourism
State Historic Preservation Office
59 South Prospect Street
Hartford, Connecticut 06106

Attn: Dr. David Poirier

**RE: Waterbury Generation, LLC
Waterbury, Connecticut**

Dear Ms. Senich:

On behalf of Waterbury Generation, LLC, TRC is requesting information from the Connecticut Commission on Culture and Tourism, State Historic Preservation Office on the occurrence of significant cultural resources in the vicinity of the proposed project area. The project will involve the construction of a new nominal 100 megawatt simple-cycle peaking power plant in Waterbury, Connecticut. The new plant would also require a 210 foot high emission stack. The project site is located in an industrial area and the new facility will primarily occupy the existing paved (vacant) parking lot that will be leased from Ansonia Copper & Brass, Inc (ACB Facility). Some of the project components will be constructed within a portion of the southern end of the existing ACB Facility (see enclosed site photograph).

In addition to the new power plant, approximately 1.5 miles of new 115 kilovolt overhead transmission line will be constructed from the existing Baldwin Substation located south of the project site. The new transmission line would follow along the east side of the existing Metro North Railroad tracks to the new power plant location. Poles would have a maximum height of 85 to 115 feet.

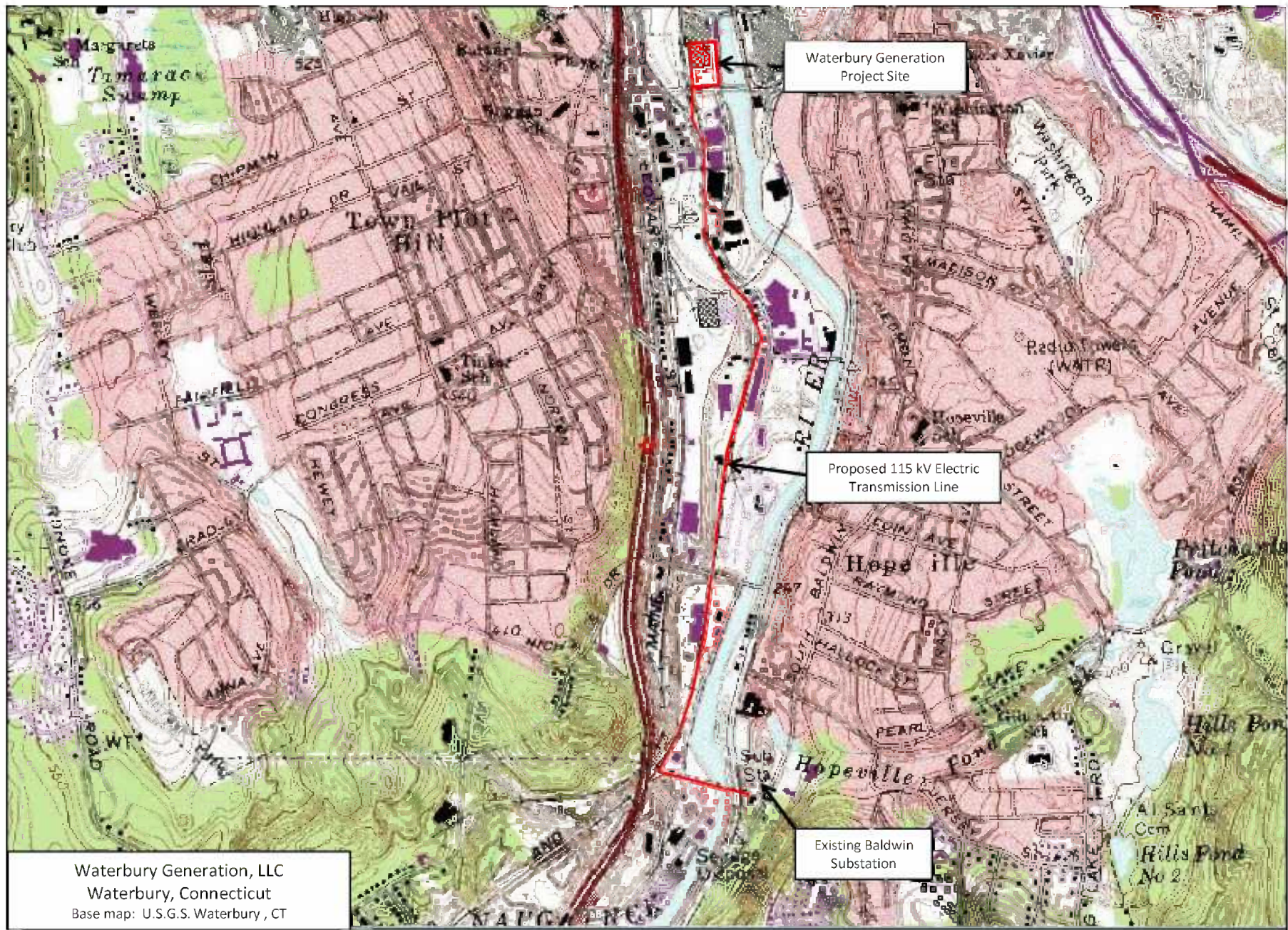
Included with this letter are a U.S.G.S. locus map and aerial photographs showing the proposed project location. If you have any questions regarding the proposed project, please do not hesitate to call me at 207 879-1930.

Regards,
TRC

Denis Blais

cc: Mike Anderson, TRC
File





Waterbury Generation
Project Site

Proposed 115 kV Electric
Transmission Line

Existing Baldwin
Substation

Waterbury Generation, LLC
Waterbury, Connecticut
Base map: U.S.G.S. Waterbury, CT



Project Area

Proposed 115 kV Electric
Transmission Line

Waterbury Generation, LLC
Waterbury, Connecticut

Base map: Google Earth 2007 – Waterbury, CT
Sheet 1 of 2



